

EXHIBIT A

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September 17, 2013

J. Gerard Stranch, IV
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Re: Meningitis Litigation

Dear Gerard and Mark:

In previous hearings in the MDL, the PSC has referenced "informal" discovery from NECC and has now specifically referenced thousands of documents produced by NECC to the PSC. As you know, despite the PSC's expectation that we evaluate our exposure for purposes of mediation, we have not been given access to any of these documents. Additionally, we are not privy to the scope of any agreement between the PSC and NECC related to NECC's production of information.

Please consider this our formal request for access, through the PSC, to this "informal" discovery from NECC. We formally request copies of any and all documents produced to the PSC by NECC, preferably in electronic form or via electronic access to any document repository.

Thank you.

Very truly yours,



Chris J. Tardio

cc: CJ Gideon, Jr. (via email)

Bcc: Matt Cline (via email)
John-Mark Zini (via email)